IN THE DISTRICT COURT OF OKLAHOMA COUNTY STATE OF OKLAHOMA

BETTY JEAN TAYLOR,)	CJ - 2022 - 757
Plaintiff,))	FILED IN DISTRICT COURT OKLAHOMA COUNTY
v.) Case No.	FEB 1 6 2022
ACADEMY, LTD, dba ACADEMY SPORTS + OUTDOORS,)	RICK WARREN COURT CLERK 50
Defendant.)	

PETITION

COMES NOW Plaintiff, Betty Jean Taylor ("Taylor"), and for her cause of action against Defendant, Academy, LTD, dba Academy Sports + Outdoors ("Academy"), states the following:

- At all times hereinafter mentioned, Defendant, Academy, owned, operated, managed, and controlled the property known as Academy Sports and Outdoors, located at 4261 N.W. 63rd
 Street and its surrounds in Oklahoma City, Oklahoma County, State of Oklahoma ("Premises").
- 2. Academy is a Texas Limited Partnership doing business in Oklahoma County and is registered with the Oklahoma Secretary of State as a Foreign Limited Partnership.
- 3. On August 26, 2021, Plaintiff, Betty Jean Taylor, was a business invitee of the Academy as she entered the Premises in question and tripped and fell over an empty wooden pallet Academy had left lying on the floor in that location.
- 4. Academy was negligent, careless, and/or reckless in its operations, care, and maintenance of the store in question in one or more of, but not limited to, the following particulars:
 - a. In that it failed to act as reasonable and prudent owners of commercial property would have acted under the same or similar circumstances;

- b. In that it failed to maintain the store premises in a safe condition so as to protect its customers and business invitees from harm;
- c. In that it failed to adequately supervise its employees to ensure that the store premises were kept and maintained in a safe and operable condition so as to prevent harm to customers and business invitees entering the same; and
- d. In that it breached the duty of care it owed to customers and business invitees.
- e. In that it failed to follow its own policies and procedures regarding maintaining its store premises in a safe condition.
- 5. Defendant is liable for the acts and actions of all of its managers, employees, agents, servants, and/or representatives working or involved in or with operating and maintaining the Premises. Defendant's liability to Plaintiff is also founded and based upon, but not limited to, the Doctrine of *Respondeat Superior*.

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6. As the direct and proximate cause of Defendant's negligent acts, actions, and omissions as noted above, Plaintiff, Betty Jean Taylor, sustained multiple significant injuries. She experienced and continues to experience significant pain and discomfort all to her detriment for which she prays judgment in excess of \$ 75,000.00.

WHEREFORE, Plaintiff, Betty Jean Taylor, respectfully prays for judgment against Defendant in an amount in excess of \$ 75,000.00, costs of the court and any other relief this Court deems just and proper.

Respectfully submitted, LAWTER & ASSOCIATES, P.L.L.C.

By:

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